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Attorneys for Defendant
Mr. Wilson

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:21-cr-155-JAM
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
) STATUS CONFERENCE AND EXCLUDE TIME
JOSHUA WILSON and) Date: October 19, 2021
CODY CRAMER,) Time: 9:30 a.m.
Defendants.) Judge: Hon. John A. Mendez

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmoammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody Cramer that the status hearing currently set for October 19, 2021 at 9:30 be continued to December 14, 2021 at 9:30 a.m.

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on October 19, 2021 at 9:30 a.m.
2. By stipulation, Mr. Wilson now moves to continue the status conference to December 14, 2021 at 9:30 a.m.
3. The government has represented to counsel for Mr. Wilson that it anticipates

discovering approximately thirty pages of reports, seven video recordings, and twenty photographs in the next ten days or so. The Caldor Fire has caused delays in the production of discovery to the defense.

4. Mr. Wilson requires additional time to review the discovery, investigate and research possible defenses, research potential pretrial motions, and explore potential resolutions to the case, and otherwise prepare for trial.
5. Mr. Wilson believes that failure to grant the requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
6. Neither the government nor Mr. Cramer object to the continuance.
7. Therefore, the parties stipulate that the ends of justice served by granting the continuance outweighs the best interest of the public, Mr. Wilson, and Mr. Cramer in a speedy trial, and request the Court so to find.
8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between October 19, 2021 and December 14, 2021, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public, Mr. Wilson, and Mr. Cramer in a speedy trial.

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Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: October 15, 2021

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Wilson

Date: October 15, 2021

/s/ Kyle R. Knapp
Kyle R. Knapp
Attorney for Mr. Cramer

Date: October 15, 2021

PHILLIP A. TALBERT
Acting United States Attorney

/s/ James R. Conolly
James R. Conolly
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Date: October 15, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE